

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

TAFFANY HAMILTON)	CIVIL ACTION NO. 2:21-cv-02262-DCN
CLEVELAND,)	
)	
Plaintiff,)	S U M M O N S
)	(PERSONAL INJURY)
vs.)	(JURY TRIAL DEMANDED)
)	
S2F INSTALLATION, LLC,)	
)	
Defendant.)	

TO THE DEFENDANT ABOVE-NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber at his office, 108 Central Avenue, Suite 7, Goose Creek, South Carolina 29445, within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in the Complaint and judgment by default will be rendered against you for the relief demanded in the Complaint.

S/JOHNNY F. DRIGGERS
JOHNNY F. DRIGGERS, ESQUIRE
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ATTORNEY FOR PLAINTIFF

Goose Creek SC

July 23, 2021.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

TAFFANY HAMILTON)	CIVIL ACTION NO. 2:21-cv-02262-DCN
CLEVELAND,)	
)	
Plaintiff,)	C O M P L A I N T
)	(PERSONAL INJURY)
vs.)	(JURY TRIAL DEMANDED)
)	
S2F INSTALLATION, LLC,)	
)	
Defendant.)	

Plaintiff, complaining of the Defendant, alleges and says:

1. Plaintiff is a citizen and resident of Berkeley County, South Carolina. Defendant is a corporation organized under the laws of a state other than South Carolina, and transacts business in Charleston, South Carolina.

2. On September 18, 2018 Defendant was performing construction/repair work at Plaintiff's place of employment, Gildan Charleston Inc., located at 1980 Clements Ferry Rd., Charleston, SC.

3. As Plaintiff was walking through her place of employment, an employee of Defendant dropped a metal pipe from overhead that struck Plaintiff on her left wrist and upper body.

4. Defendant was negligent and reckless in one or more of the following ways:

- a. Failing to properly secure the pipe;
- b. Failing to barricade the area to keep persons, including Plaintiff, from walking underneath;
- c. Failing to warn persons, including Plaintiff, of overhead work being performed;
- d. Failing to exercise the degree of caution that a reasonably prudent construction/repair firm would have performed under the same or similar circumstances.

As a direct result of Defendant's negligence/recklessness, Plaintiff has sustained the following damages:

- a. Medical bills, including hospital, physician, and prescription charges;
- b. Physical and mental pain-and-suffering;
- c. Permanent physical impairment;
- d. Loss of income;
- e. Impairment of earning capacity.

WHEREFORE, Plaintiff demands judgment against Defendant for such amount of actual and punitive damages as the trier of fact shall determine, for the costs of this action, and for such further relief as the Court deems proper.

(Signature page follows)

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